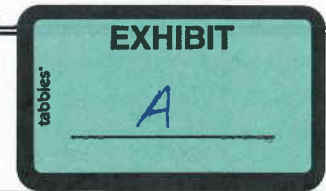


AO 88 (Rev. 1/94) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT



Middle District of Tennessee
Donyaël Henry and Nicki Henry

SUBPOENA DUCES TECUM IN A CIVIL CASE

V.
Allstate Property and Casualty Insurance Co. and Loyd
Jones

CASE NUMBER: 1 2:08 CV 02346

A Person to be Designated by Allstate Property and Casualty
TO: Insurance Co. pursuant to Rule 30(b)(6) to testify on the topics
presented in Exhibit A attached hereto.

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify
in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in
the above case.

PLACE OF DEPOSITION	DATE AND TIME
718 A South Church St., Murfreesboro, TN 37130	May 27, 2010 11:00 a.m.

☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the
place, date, and time specified above (list documents or objects):

PLACE	DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more
officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each
person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Bradley W. Eskins 	May 21, 2010
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	

50 North Front Street, Suite 590, Memphis, TN 38103 901-578-6902

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**DONYAEL HENRY
and NICKI HENRY,**

Plaintiffs,

VS

NO. 2:08 CV 02346

**ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY
AND LOYD JONES,**

Defendants.

RULE 30(b)(6) DEPOSITION NOTICE DUCES TECUM

**TO: Allstate Insurance Company
c/o David Waldrop
9032 Stone Walk Place
Germantown, TN 38138**

TAKE NOTICE that Donyaël Henry and Nicki Henry (herein after collectively referred to as "Plaintiffs") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure will take upon oral examination the deposition of the Allstate employee and/or representative with knowledge of the following:

- (1) Knowledge of Allstate's internal and/or external training requirements for Insurance Agents selling homeowner policies during 2006 through 2007 and the applicability of this training to the facts and circumstances surrounding the insurance application made by the Plaintiffs;

- (2) Please produce at this deposition the entire training materials provided to agents such as Lloyd Jones selling homeowners insurance policies during calendar years 2006 and 2007 to include but not limited to new training, annual recurrent training and any and all other training received by such agents.
- (3) Knowledge of the purpose and completeness of each and every exhibit attached to the deposition of Richard Reed, an Allstate employee, taken on May 20, 2010.
- (4) If any of the documents marked as an Exhibit to the deposition of Richard Reed taken May 20, 2010 are not full and complete please produce at this deposition the full and complete document.
- (5) Knowledge of Allstate's computer based Risk Management Policy ("RMP") and all information contained therein regarding the underwriting of homeowner policies in effect in 2006 and 2007 respectively;
- (6) Please produce at this deposition, the entire online RMP in effect during 2006 and 2007 respectively.

This deposition will be taken stenographically and/or by video recording before a notary and other duly authorized officer authorized to administer oaths.

The deposition will continue from day to day until completed and will be taken pursuant to the Federal Rules of Civil Procedure. The deposition will take place on a May 27, 2010 at the law office of Smith and Artrip, 718 A South Church Street, Murfreesboro, Tennessee 37130. You are invited to attend and cross examine.

Respectfully Submitted,

ESKINS KING, P.C.

By: /s Bradley W. Eskins
Bradley W. Eskins (19372)
James E. King, Jr. (21219)
Attorney for Plaintiffs
50 N. Front St., Suite 590
Memphis, TN 38103
901-578-6902

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system this the 21st day of May 10, 2010.

/s Bradley W. Eskins.